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Attorneys for Defendant The Procter & Gamble Company

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JAMIE PETTIT, an individual, on behalf of
himself, the general public, and those
similarly situated,

Plaintiff,

v.

PROCTER & GAMBLE COMPANY; AND
DOES 1 THROUGH 50,

Defendants.

Civil Case No.: 3:15-cv-02150-RS

ORDER

**JOINT STIPULATION TO
ADJUST CLASS
CERTIFICATION DEADLINES
AND HEARING DATE IN LIGHT
OF UNFORESEEN
CIRCUMSTANCES**

Pursuant to Civil L.R. 6-1(b), 6-2, and 7-12, plaintiff Jamie Pettit and defendant The Procter & Gamble Company (“P&G”) respectfully submit this joint stipulation to adjust the opposition and reply deadlines related to plaintiff’s motion for class certification, as well as the hearing date for that motion.

WHEREAS, at the August 13, 2015 Case Management Conference and in a subsequent order, this Court set an initial briefing schedule for plaintiff’s motion for class certification (*see* Dkt. No. 24);

WHEREAS, the parties filed joint stipulations on five subsequent occasions to extend and/or adjust the schedule for class certification, each of which was entered by the Court (*see* Dkt. Nos. 27, 29, 31, 41, and 64);

WHEREAS, plaintiff timely filed her motion for class certification on February 14, 2017;

WHEREAS, under the current schedule, P&G would file its opposition by March 31, 2017; plaintiff would file her reply by May 2, 2017, and the hearing is on calendar for 1:30 p.m. on May 18, 2017 (*see* Dkt. No. 64);

WHEREAS, P&G noticed a deposition of plaintiff’s expert Barry Orr, who submitted a declaration in support of class certification, in San Francisco on March 10, 2017;

WHEREAS, when Mr. Orr attempted on March 8, 2017 to travel to San Francisco from his home in City of London, Ontario, Canada, he was denied entry into the United States by officers of Customs and Border Protection (“CBP”) because he did not have a certain visa;

WHEREAS, this development was unforeseen as Mr. Orr has never been denied entry into the United States before (including to sit for depositions in the United States), and plaintiff’s counsel understands CBP has only recently started enforcing the visa requirement described above;

WHEREAS, plaintiff’s counsel and Mr. Orr are securing the necessary documentation for the visa and expect Mr. Orr to be available for his deposition in San Francisco on March 31, 2017;

WHEREAS, in light of this unforeseen three-week delay in Mr. Orr’s deposition, the parties propose to adjust the opposition and reply deadlines for plaintiff’s motion for class certification, and move the hearing date forward one week.

NOW THEREFORE, THE PARTIES BY COUNSEL HEREBY STIPULATE as follows:

1 P&G shall file its opposition to plaintiff's motion for class certification by April 13,
2 2017; plaintiff shall file her reply by May 11, 2017, and the hearing will be calendared for 1:30 p.m. on
3 May 25, 2017, or another date convenient for the Court.

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6 DATED: March 17, 2017

COVINGTON & BURLING LLP

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8 By: /s/ Cortlin H. Lannin
Cortlin H. Lannin

9 *Attorneys for Defendant*
10 The Procter & Gamble Company

11 DATED: March 17, 2017

GUTRIDE SAFIER LLP

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13 By: /s/ Adam Gutride
Adam Gutride

14 *Attorneys for Plaintiff*

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17 **PURSUANT TO STIPULATION, AND FOR GOOD CAUSE SHOWN, THE**
18 **COURT ORDERS AS FOLLOWS:**

19 P&G shall file its opposition to plaintiff's motion for class certification by April 13,
20 2017; plaintiff shall file her reply by May 11, 2017, and the hearing will be calendared for 1:30 p.m. on
21 May 25, 2017, or another date convenient for the Court.

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23 DATED: 3/23/17

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25 THE HONORABLE RICHARD SEEBORG
26 UNITED STATES DISTRICT JUDGE
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